

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

LACI N. BLANCHARD,  
INDIVIDUALLY, AND AS NEXT  
FRIEND OF W.B., SURVIVING  
MINOR CHILD OF RONNIE P.  
BLANCHARD, JR.

*Plaintiff,*

V.

SANARE ENERGY PARTNERS LLC,  
ET AL.

*Defendants.*

CIVIL ACTION NO. 4:22-CV-2420

JUDGE: GEORGE C. HANKS, JR.

MAGISTRATE JUDGE: ANDREW M.  
EDISON

**MOTION FOR COURT TO ENTER STANDARD PROTECTIVE ORDER**

To the Honorable George C. Hanks, Jr., U.S. District Judge:

Defendant, Sanare Energy Partners, LLC (“Sanare”) files this agreed motion respectfully requesting this Court enters its standard protective order in these proceedings.

## I. Argument

This court may enter protective orders pursuant to Federal Rule of Civil Procedure 26(c) to ensure the confidential information of a party is disclosed only in accordance with this Court's protective order. The parties have conferred in this matter, and all agreed to the form and substance of the Court's standard protective order which is attached to this motion as *Exhibit 1*.

## II. Request For Relief

Sanare Energy Partners, LLC respectfully requests the Court grant this Motion as soon as practicable and enter its standard protective order, attached to this motion as *Exhibit*

*I.* Sanare requests any other, further, or alternative relief to which it is entitled.

**Date: August 10, 2023.**

Respectfully submitted,

By /s/Aaron E. Koenck  
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**SANARE ENERGY PARTNERS, LLC**

**CERTIFICATE OF CONFERENCE**

On July 24, 2023, counsel for Sanare, Aaron E. Koenck, contacted counsel for Plaintiff and All Coast, LLC by email requesting their position on the substance and form of the Standard Protective Order which is attached to this motion as *Exhibit 1*.

Plaintiff's counsel responded on July 27, 2023, by email and stated they agreed to the form and substance of the Standard order and may sign *Exhibit 1* by permission.

Counsel for All Coast, LLC responded on July 28, 2023, by email and stated they agreed to the relief sought in this motion by email and stated they agreed to the form and substance of the Standard order and may sign *Exhibit 1* by permission.

/s/ Aaron E. Koenck

Aaron E. Koenck

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing has been served on all counsel of record via U.S. Mail, return receipt requested, or through the Clerk of this Court on August 10, 2023.

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/s/ Aaron E. Koenck

Aaron E. Koenck